

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

DEFENDANTS' PROPOSED VOIR DIRE QUESTIONS

Defendants hereby propose that the following voir dire questions be used as a supplement to the standard questions set forth in Local Rule 47.1:

Juror's Name: _____ Juror's Number: _____

For purposes of the following questions, the term “immediate family” includes spouses, children, parents, brothers, sisters and persons sharing your residence.

2. Are you acquainted with any party referred to below who may testify as a witness during the trial of this case? If yes, circle the individual(s).

(a) Gregory Wilkes (b) Randy McElravy (c) James Bedilion
(d) Robert Richmond

3. Have you, or has any member of your immediate family, ever been the victim of a crime?

Yes _____ No _____

4. If your answer to question No. 3 is "Yes," would that fact affect your ability to render a fair and impartial verdict based on the evidence presented in court and the judge's instructions on the law?

Yes _____ No _____

5. Have you, or any member of your immediate family, ever been employed in law enforcement, either by a state or local police department, government agency, investigative agency, private detective or security guard agency or prosecuting attorney's office?

Yes _____ No _____

6. Have you, or has any member of your immediate family, ever been employed by or in any way connected with the Commonwealth of Pennsylvania?

Yes _____ No _____

7. Have you, or any member of your immediate family, ever been employed by, or in any way connected with, the Pennsylvania Department of Corrections?

Yes _____ No _____

8. Have you, or has any member of your immediate family, ever been employed in a jail or prison, or as a parole or probation officer?

Yes _____ No _____

9. Would you tend to believe the testimony of a corrections official, simply because he or she is a corrections official, more than the testimony of a citizen of this state?

Yes _____ No _____

10. Would you tend to disbelieve the testimony of a corrections official, simply because he or she is a corrections official, more than the testimony of a citizen of the state?

Yes _____ No _____

11. Have you, or has any member of your immediate family, ever been incarcerated in a local, state, or federal prison for conviction of a criminal offense?

Yes _____ No _____

12. Do you have any feeling, opinion or belief concerning the nature or quality of prisons generally or the actions of employees at SCI-Greene specifically, that would affect your ability to serve as a fair and impartial juror and render a fair and impartial verdict based on the evidence presented in court and the court's instructions on the law in a case in which the plaintiff is a citizen of this state and the defendants are corrections officers?

Yes _____ No _____

13. Have you, or has any member of your immediate family, been associated with a prisoners' rights organization?

Yes _____ No _____

14. Have any of you heard or read things in the media which relate to prison conditions? [If the answer is yes, follow-up questions should be done at side bar so as not to taint the rest of the jury pool].

Yes _____ No _____

15. Would your personal religious beliefs or convictions affect your ability to serve as a fair and impartial juror and render a fair and impartial verdict based on the evidence presented in court and the court's instructions on the law concerning a prisoner?

Yes _____ No _____

Respectfully submitted,

Thomas W. Corbett, Jr.
Attorney General

BY: /s/ Craig E. Maravich
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Date: January 23, 2006

CERTIFICATE OF SERVICE

I hereby certify that on March 9, 2006, I electronically filed the foregoing *Defendant's Proposed Voir Dire* with the Clerk of Court using the CM/ECF system. And I hereby certify that I have mailed the foregoing document by United States Postal Service to the following non CM/ECF participants:

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By: /s/ Craig E. Maravich
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